

1 Stephen R. Cochell
2 Admitted Pro Hac Vice
3 *srcochell@gmail.com*
4 5850 San Felipe, Ste. 500
5 Houston Texas 77057
6 Telephone: (713) 436-8000
7 Facsimile: (213) 623-2000

8
9 Allan Grant (SBN#213658)
10 Grant's Law Firm
11 17351 Greentree Drive
12 Riverside, California 92503-6762
13 Telephone (888)937-7555
14 Facsimile (866)858-6637

15
16 Attorneys for Defendant
17 JASON EDWARD THOMAS CARDIFF

18
19
20 UNITED STATES DISTRICT COURT
21
22 CENTRAL DISTRICT OF CALIFORNIA

23
24
25
26
27
28 UNITED STATES OF AMERICA,
vs.
JASON EDWARD THOMAS
CARDIFF,
Defendant.

Case No. 5:23-cr-00021-JGB

**DECLARATION OF STEPHEN R.
COCHELL IN SUPPORT OF
JASON CARDIFF'S EX PARTE
APPLICATION FOR AN ORDER
PERMITTING INTERNATIONAL
TRAVEL AND RETURNING HIS
PASSPORT**

*[Filed concurrently with Ex Parte
Application and [Proposed] Order]*

DECLARATION OF STEPHEN R. COCHELL

I, Stephen R. Cochell, declare as follows:

3 1. I represent Jason Cardiff in this matter. I make this declaration in support
4 of Jason Cardiff's Ex Parte Application for an Order Permitting International Travel
5 and Returning his Passport.

6 2. Mr. Cardiff has been released on a \$530,000 appearance bond, justified in
7 the amount of \$500,000 with full deeding of real property. His release conditions
8 include: a travel restriction to the Central District of California and the Southern
9 District of Texas; a curfew between the hours of 8:00 p.m. and 8:00 a.m.; and,
10 placement in the custody of third-party custodian, Attorney Stephen Cochell. Lilia
11 Murphy and Brian Kennedy executed affidavits of sureties in support of the bond.
12 Ms. Murphy also deeded her home as collateral. The December 6, 2023 Release
13 Order and Bond Form is attached as Exhibit A.

14 3. Mr. Cardiff is living with Attorney Cochell in the Kingwood, Texas, and he
15 is being supervised by United States Probation Officer Jack Sherrod of the Southern
16 District of Texas.

17 4. On July 22, 2024, this Court granted a similar motion filed by Mr. Cardiff
18 asking permission to travel to his home in Dublin Ireland and that the Court release
19 his passport and lift his curfew during the time allowed in Ireland. Dkt. 87-2.

20 5. Mr. Cardiff makes this request to allow Mr. Cardiff to assist his wife,
21 Eunjung Cardiff, with her ongoing medical needs during the time period and to
22 assist their small child. Mr. Cardiff also has scheduled necessary medical
23 appointments for himself, including a consultation with his pulmonologist. During
24 the nine months of pretrial release, Mr. Cardiff has consistently complied with all
25 court orders and has previously traveled both domestically and internationally with
26 court approval without incident.

27 6. Mr. Cardiff previously traveled to assist his wife after she suffered a
28 medical emergency. Mr. Cardiff informs me that he stayed in touch with Mr.

1 Sherrod, his pretrial services officer, during his stay and kept him abreast of his
2 whereabouts and schedule. Mr. Cardiff returned to the United States without
3 incident. Mr. Cardiff has traveled on business on a number of occasions, also
4 without incident and consistent with the Court's prior orders allowing travel.

5 7. On September 3, 2024, I talked directly to Joe Torres, a supervisor at the
6 Pretrial Services Office in Los Angeles who stated that he is not opposed to Mr.
7 Cardiff's overseas travel.

8 Mr. Cardiff will return to Texas as scheduled and will maintain regular
9 contact with Joe Torres, while traveling. Additionally, Mr. Cardiff will supply Mr.
10 Torres and Pretrial Services with a full travel itinerary prior to his departure.

11 I declare under penalty of perjury under the laws of the United States of
12 America that the foregoing is true and correct to the best of my knowledge.

13 Executed on this 3d day of September, 2024, at Los Angeles, California.

14
15 /s/ Stephen R. Cochell
16 Stephen R. Cochell

17 Dated: September 3, 2024
18
19
20
21
22
23
24
25
26
27
28